

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
IN ADMIRALTY

CASE NO: 22-61542

IN THE MATTER OF CARIBSHIP LLC,
AS OWNER AND SEACOR ISLAND LINES
LLC AS OPERATOR/OWNER PRO HAC VICE OF
THE M/V CARIBBEAN EXPRESS I PETITIONING
FOR EXONERATION FROM OR LIMITATION
OF LIABILITY

Petitioners,

v.

SEATREK CHARTERS Inc.

Claimants.

/

MOTION TO WITHDRAW AS COUNSEL

COMES NOW Fertig & Gramling including its attorney, John H. Wilbur III, hereby files this motion to withdraw as counsel for Claimant SEATREK CHARTERS, INC. pursuant to Rule 11.1 (d)(3) of the Local rules for U.S. District Court of the Southern District of Florida and states as follows:

1. Irreconcilable differences regarding the litigation and proceeding on the client's behalf have arisen between Fertig & Gramling and Plaintiff.
2. Counsel has raised these differences with Plaintiff's representatives.
3. The relationship is irretrievably broken.
4. The current contact information for Plaintiff is:

SeaTrek Charters Inc
151 North Beach Rd – C 8
Dania Beach, FL 33004
captain@seatrekcharter.com

And

PO Box 460506
Ft Lauderdale, Florida 33346

5. The undersigned conferred with counsel for Defendants regarding the Motion to Withdraw who do not object.

Wherefore, Fertig & Gramling respectfully request this Court's entry of an Order allowing it to withdraw as counsel for Plaintiff and providing for such other and further relief as this Court deems appropriate.

Respectfully Submitted,

By: /s John H. Wilbur III
John H. Wilbur III (1031177)
FERTIG & GRAMLING
200 Southeast 13th Street
Fort Lauderdale, FL 3316
PH: (954) 763-5020
FX: (954) 763-5412
John.wilbur@fertig.com
Attorneys for Claimants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by CM/ECF on September 22, 2021 on all counsel or parties of record on the Service List below.

Respectfully Submitted,

By: /s John H. Wilbur III
John H. Wilbur III (1031177)
FERTIG & GRAMLING

SERVICE LIST

Ryon L. Little
Charles G. De Leo
De Leo & Kuylenstierna, P.A.
8950 SW 74th Court
Suite 1710
Miami, Florida 33156
rlittle@dkmaritime.com
cdeleo@dkmaritime.com
Telephone: (786) 332-4909
Counsel for Plaintiffs